

Steven A. Kraemer, OSB No. 882476

E-mail: skraemer@cisoregon.org

David C. Lewis, OSB No. 953348

E-mail: dlewis@cisoregon.org

Lauren E. Nweze, OSB No. 145218

E-mail: lnweze@cisoregon.org

KRAEMER & LEWIS

P.O. Box 1469

Lake Oswego, OR 97035

Telephone: (503)763-3875

Facsimile: (503) 763-3901

Of Attorneys for Defendants Columbia County
Sheriff's Office and Columbia County

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

DOUGLAS DWAYNE NELSON, an
individual,

Plaintiff,

v.

**COLUMBIA COUNTY SHERIFF'S
OFFICE**, a department of Columbia County,
COLUMBIA COUNTY, a political
subdivision of the state of Oregon, **CORRECT
CARE SOLUTIONS, LLC**, a Tennessee
corporation, **MDX-MDL HOLDINGS, LLC**,
dba **TRIDENTCARE AND SCHRYVER
MEDICAL**, Maryland corporations, and
ELLIOTT JAY WAGNER, M.D., an
individual,

Defendants.

No. 3:20-cv-01906-BR

**DECLARATION OF LAUREN E.
NWEZE IN SUPPORT OF
DEFENDANTS COLUMBIA COUNTY
SHERIFF'S OFFICE AND COLUMBIA
COUNTY'S JOINDER IN NOTICE OF
REMOVAL OF ACTION**

I, Lauren E. Nweze, declare as follows:

1. I am one of the attorneys representing defendant Columbia County Sheriff's Office and Columbia County in the present action. I make this Declaration upon my personal knowledge based upon review of the documents provided. I make this declaration in support of defendants Columbia County Sheriff Office and Columbia County's Joinder in Notice of Removal of Action.

2. A true and correct copy of the Complaint filed by plaintiff on October 12, 2020, in Columbia County Circuit Court as *Douglas Dwayne Nelson v. Columbia County Sheriff's Office, et al*, Case No. 20CV35094, is attached hereto as Exhibit 1.

3. A true and correct copy of the Amended Complaint was filed by plaintiff on October 21, 2020, in Columbia County Circuit Court as *Douglas Dwayne Nelson v. Columbia County Sheriff's Office, et al*, Case No. 20CV35094, is attached hereto as Exhibit 2.

4. On October 28, 2020, defendants Columbia County Sheriff's Office and Columbia County received via process server a copy of the Complaint and Summons. A true copy of all process, pleadings and orders that have been served on defendants Columbia County Sheriff's Office and Columbia County are attached hereto as Exhibit 3.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Respectfully submitted this 13th day of November 2020.

KRAEMER & LEWIS

By: s/ Lauren E. Nweze

Steven A. Kraemer, OSB No. 882476
Lauren E. Nweze, OSB No. 145218
Of Attorneys for Defendants Columbia
County Sheriff's Office and Columbia
County